

Attorneys for Plaintiff  
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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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HEATHER L. EASON, :

Plaintiff, :

08 Civ. 3557 (SCR)

-against- :

**NOTICE TO PRODUCE**

GP AVIATION SERVICES, LLC :

and EAST WEST FLIGHT, LLC and :

THOMAS CONNELLY, :

Defendants. :

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S I R S:

PLEASE TAKE NOTICE that pursuant to FRCP 34 you are required to produce within thirty (30) days hereof, the following documents for purposes of inspecting and copying the same.

**DEFINITIONS**

A. As used herein, "document" shall mean any printed, written, recorded, taped, electronic, graphic, computerized printout or other tangible matter in any and all defendant's

possession, custody or control, from whatever source, however produced or reproduced, whether in draft or otherwise, whether sent or received or neither, including the original and any non-identical copy (whether different from the original because of notes or markings made or attached to such copy or because of any other reason), including, but not limited to correspondence, memoranda, reports, agreements, contracts, statements, notes, computations, audio tape recordings, records, plans, appraisals, maps, deeds, mortgages, leases, bills, invoices, checks, money orders, surveys, and pleadings.

B. As used herein, "communication" is used in the broadest sense possible and includes any statement from one person to another, whether made orally or in writing, by telephone, in a document, at a meeting or otherwise.

C. As used herein, "referring to" is used in the broadest sense possible and includes any reference to or connection with the above case, including but not limited to, references or connections arising out of the above case.

D. Whenever used herein, the word "including" means "including without limitation."

### **INSTRUCTIONS**

A. This discovery request shall be deemed continuing so as to require further and supplemental production if defendant discovers, obtains or creates additional responsive documents between the time of initial production and the time of trial.

grounds of destruction, loss, privilege, or attorney work product, and if any objections are interposed, to specify the basis or reasons for each. If any document requested herein was formerly in any or all defendant's possession, custody or control and has been lost or destroyed, defendant is requested to submit in lieu of such a document a written statement identifying the author(s), recipient(s), subject matter, date prepared, date the document was lost or destroyed, reason(s) for such destruction and the person(s) requesting and performing the destruction. With respect to any documents withheld from production on the grounds of privilege or attorney work product, defendant is requested to identify each such document by author(s), recipient(s), subject matter, date, title, subject matter and nature of privilege claimed. If any information is withheld because it is stored electronically, defendant is requested to identify the subject matter of the information, the place or places where such information is stored and maintained, and the custodian thereof.

C. Any description of documents requested that is specific in nature should not be interpreted to diminish the breadth of any more general request that may otherwise encompass such specified documents.

D. All documents produced for copying and inspection pursuant to these requests are to be segregated and labeled to correspond with the categories in this request to which they are responsive.



**DOCUMENTS REQUESTED**

1. Any records and/or agreements regarding the work and/or employment of Plaintiff for or on behalf of defendants.
2. Any records of work and/or employment of the pilot and co-pilot of the subject aircraft regarding the allegations in the complaint, including, but not limited to, copies of any evidence of payment of wages, salaries and/or benefits.
3. Flight plans of the trip the aircraft was on the date of the accident.
4. Any records of defendants regarding any workers' compensation benefits that plaintiff may have received due to the accident in question.
5. Any letters, correspondence, documents, memoranda by and among plaintiff and defendants regarding the matters alleged in the complaint.
6. The leases or documents evidencing or memorializing the arrangement for the aircraft in question between the defendants East West Flight, LLC and GP Aviation Services, LLC.
7. Any records, letters, claims to insurance carriers, reports to the Federal Aviation Administration or any other entity or person regarding the accident in question.
8. All documents which defendants expect to introduce at the trial of this matter.

understandings between and among defendants and any other persons and/or entities regarding plaintiff's employment/work on the subject aircraft.

10. Any manuals, documents, circulars, instructions, and/or books maintained by defendants regarding plaintiff's employment/work on the subject aircraft.

11. Any reports of the incident alleged in the complaint to any Federal, State and/or municipal agency, department, administration or other such entity.

12. The flight plan of the aircraft on the date of the incident alleged in the complaint.

Dated: White Plains, New York  
June 10, 2008

Yours, etc.

BAKER, LESHKO, SALINE & BLOSSER LLP  
*Attorneys for Plaintiff*

By: 

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